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Attorney for Defendants *Twitter, Inc.*,
Jack Dorsey and *Ned Segal*

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

KHAN M. HASAN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

TWITTER, INC., JACK DORSEY, and NED
SEGAL,
Defendants.

Case No.: 4:19-cv-07149-YGR

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR ALL
DEFENDANTS TO RESPOND TO
COMPLAINT AND CONTINUING
CASE MANAGEMENT
CONFERENCES**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: Yvonne Gonzales Rogers

1 **WHEREAS**, this action is a proposed class action alleging violations of the federal
 2 securities laws against Twitter, Inc. (“Twitter”), Jack Dorsey and Ned Segal (collectively
 3 “Defendants”).

4 **WHEREAS**, absent an extension, Twitter would be due to answer, move, or otherwise
 5 respond to the *Hasan* Complaint on November 22, 2019;

6 **WHEREAS**, absent an extension, defendants Jack Dorsey and Ned Segal would be due
 7 to answer, move, or otherwise respond to the *Hasan* Complaint on November 29, 2019;

8 **WHEREAS**, on October 30, 2019, this Court issued an Initial Case Management
 9 Scheduling Order and SEC Class Action Notice, setting the Initial Case Management Conference
 10 for January 27, 2020 at 2:00 p.m. (Dkt. 5);

11 **WHEREAS**, this action is subject to the requirements of the Private Securities Litigation
 12 Reform Act of 1995, Pub. L. No. 104-67, 109 Stat. 737 (1995) (the “Reform Act”), which sets
 13 forth specialized procedures for the administration of securities class actions;

14 **WHEREAS**, the Reform Act provides for the appointment of a lead plaintiff to act on
 15 behalf of the purported class, and further provides that the appointment of lead plaintiff shall not
 16 be made until after a decision on a motion to consolidate is rendered (15 U.S.C. 78u-
 17 4(a)(3)(B)(ii));

18 **WHEREAS**, the last day to file motions to serve as lead plaintiff is December 30, 2019.
 19 (Dkts. 5, 7);

20 **WHEREAS**, the parties expect a consolidated complaint will be filed after the
 21 determination of the lead plaintiff motions;

22 **WHEREAS**, Defendants anticipate filing motions to dismiss the claims asserted against
 23 them in response to the consolidated complaint and the parties stipulate and submit below a
 24 briefing schedule to the Court in connection with any such motions;

25 **WHEREAS**, because the special procedures specified in the Reform Act contemplate (i)
 26 the consolidation of similar actions, (ii) appointment of lead plaintiff, and (iii) the filing of a
 27 single consolidated complaint by lead plaintiff and counsel to be appointed by the Court,

requiring Defendants to respond to the initial *Hasan* Complaint by the current response dates would result in the needless expenditure of private and judicial resources;

WHEREAS, pursuant to the Reform Act, unless otherwise ordered by the Court, discovery in this action is stayed during the pendency of any motion to dismiss (15 U.S.C. § 78u-4(b)(3)(B));

WHEREAS, counsel for the plaintiffs and defendants in the above-captioned action respectfully submit that good cause exists to vacate the existing January 27, 2020 initial case management conference and associated ADR deadlines until such time as the Court has the opportunity to rule on the appointment of lead plaintiff and approval of lead counsel.

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the parties, that:

1. Defendants do not have to answer, mover or otherwise respond to the current complaint;

2. Within 45 days following the appointment of Lead Plaintiff, a Consolidated Complaint will be filed;

3. Defendants shall move, answer or otherwise respond to the Consolidated Complaint within 45 days after the Consolidated Complaint is filed and served;

4. Lead Plaintiff shall file any opposition to any motion to dismiss within 45 days of Defendants' response to the Consolidated Complaint;

5. Defendants shall file any reply in support of any motion to dismiss within 30 days of Lead Plaintiff's Opposition.

6. The Initial Case Management Conference scheduled for January 27, 2020 be vacated, along with any associated deadlines under the Federal Rules of Civil Procedures and the Local Civil Rules for the United States District Court for the Northern District of California and all associated ADR Multi-Option Program deadlines, to be rescheduled for a date after the Court has the opportunity to rule on the appointment of lead plaintiff and approval of lead counsel.

1 DATED: November 22, 2019

LATHAM & WATKINS LLP

2 /s/ Michele D. Johnson

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27 Attorney for Defendants *Twitter, Inc.,*

Jack Dorsey and Ned Segal.

1 DATED: November 22, 2019

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Attorneys for Plaintiff *Khan M. Hasan*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2
3
4 DATED:

5 Hon. Yvonne Gonzalez Rogers
6 United States District Court Judge
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Extending Time for All Defendants to Respond to Complaint and Continuing Case Management Conferences. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Michele D. Johnson, attest that concurrence in the filing of this document has been obtained.

DATED: November 22, 2019

/s/ Michele D. Johnson

Michele D. Johnson